

# **EXHIBIT J**

**Proposed Order: Suggestion of Remand**

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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X  
IN RE: TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001

03 MDL 1570 (GBD)

\_\_\_\_\_  
X  
THIS DOCUMENT RELATES TO:

*Fiona Havlish, et al. v. Bin-Laden, et al.*  
03 CV 9848 (GBD)

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*This document is filed on behalf of those Plaintiffs in the above case seeking unliquidated damages for losses as they relate to personal injuries and deaths suffered by victims of the September 11<sup>th</sup> Terrorist Attacks. Those Plaintiffs are listed in Exhibit A attached hereto.*

**DEAFULT JUDGMENT AND SUGGESTION OF REMAND**

This action having been commenced on February 19, 2002 in the United States District Court, District of Columbia, by the filing of the *Havlish* Summons and Complaint, and the Non-Sovereign Defendants, Sheikh Usamah Bin-Muhammad Bin-Laden (a/k/a Osama bin-Laden), The Taliban (a/k/a The Islamic Emirate of Afghanistan), Muhammad Omar, and Al Qaeda/Islamic Army having failed to answer or otherwise defend against this action despite having been properly served by publication pursuant to the Order of the Honorable James Roberston dated May 9, 2002, it is hereby

ORDERED, ADJUDGED AND DECREED: The Plaintiffs listed in Exhibit A attached to Plaintiffs' Motion for Entry of Judgment by Default as seeking unliquidated damages for losses have Judgment by Default against the Non-Sovereign Defendants and are entitled to unliquidated damages. All coordinated and consolidated pretrial proceedings in the *Havlish* case are now complete. Pursuant to the Rules of Procedure of the Judicial Panel on Multidistrict Litigation, it is now appropriate for Panel to remand the *Havlish* case to the U.S.D.C., District of

Columbia (the “Originating Court”) and for the Originating Court to schedule a hearing to establish the aggregate amount of Plaintiffs’ damages.

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United States District Judge

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Dated